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March 1, 2024

Via ECF

Hon. Arun Subramanian
United States District Court Judge
Daniel Patrick Moynahan Courthouse
500 Pearl Street
New York, New York 10007

Re: Cullen v. Kijakazi
1:23 Civ 01690 (AS) (RWL)

Dear Judge Subramanian:

I write to request an extension of time, nunc pro tunc, to file Plaintiff's Objections to the February 9, 2024 Report and Recommendation. Your Honor previously granted an extension to 5:00 p.m. today, March 1, 2024. See Docket 24.

I completely failed to note the 5:00 pm restriction and only realized this now as I checked the docket to make sure the Objections were properly registered. I am thoroughly embarrassed to have missed this restriction as I have been working excessive hours and was not properly attentive to the specifics of the Court's Order. I deeply regret taking up more of the Courts time but implore the Court to grant this extension. As you will see, this case has a long history and I respectfully request that plaintiff be permitted to proceed to a determination of the merits.

I have tried to secure consent from opposing counsel SAUSA Ariella Zoltan, but she is not available at this hour.

Thank you for Your Honor's attention to this request.

Respectfully submitted,

/s/ Christopher J. Bowes
Christopher J. Bowes, Esq.
Attorney for Plaintiff

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: March 4, 2024